

LARS T. FULLER (No. 141270)
SAM TAHERIAN (No. 170953)
THE FULLER LAW FIRM, P.C.
60 No. Keeble Ave.
San Jose, CA 95126
(408)295-5595

Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re:

Michael E. Stone

Debtor

Case No.: 18-50095-MEH

AP Case No. : 18-05014-MEH

Chapter 7

**DECLARATION OF ATTORNEY IN
SUPPORT OF MOTION TO BE
RELIEVED AS COUNSEL FOR
PLAINTIFF**

Keith Tai Wong

Plaintiff

Date: none set

Time: none set

Court: none set

Judge: Hon. M. Elaine Hammond

Vs.

Michael E. Stone

Defendants

I, Sam Taherian, hereby declare and state as follows:

1. I am an attorney licensed to practice in the State of California and admitted to practice before the United States District Court for the Northern and Eastern Districts of

California.

2. I am a principal of The Fuller Law Firm, P.C., attorneys of record for Plaintiff in the instant adversary, and creditor of the estate.
3. Due to medical reasons, I have been advised that I need to make a substantial lifestyle change, including a drastic reduction in my work hours and reduction in stress. For this reason, I am scaling down the litigation cases I am handling.
4. I am the only attorney in our law firm that handles adversary proceedings, and no other attorney in our firm will have the time to litigate this adversary proceeding.
5. Additionally, there is a difference of opinion between myself and plaintiff regarding litigation strategy. The difference of opinion is such that it impairs our firm from effectively representing Plaintiff.
6. At least nine months ago, I informed Plaintiff of my health issues. At least three months ago, I informed him that I would have to scale back my work hours, and advised him to seek other competent counsel.
7. I will provide Mr. Wong with a complete electronic copy of his file, and will take all other steps necessary to ensure that Mr. Wong is not prejudiced once our law firm is relieved as attorney of record.
8. I have advised Mr. Wong that should he interview or, choose to retain new counsel, I will be more than happy to communicate with such counsel to advise him or her of the relevant facts. This will assist Mr. Wong in evaluating new counsel and/or assist his new counsel in litigating this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th Day of June, 2019 at San Jose, California.

THE FULLER LAW FIRM

60 N. KEEBLE AVE.

SAN JOSE, CALIFORNIA 95126

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By: /s/ Sam Taherian
SAM TAHERIAN, ESQ.
on behalf of Movant